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7 Attorneys for Respondent
8 Bombard Mechanical, LLC

9
10 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 UNITED ASSOCIATION OF JOURNEYMEN)
12 AND APPRENTICES OF THE PLUMBING &)
PIPE FITTING INDUSTRY OF THE)
13 UNITED STATES AND CANADA, LOCAL)
525, LAS VEGAS, NEVADA AFL-CIO,)
14)
15 Petitioner,)

16 vs.)

17 BOMBARD MECHANICAL, LLC, a Nevada)
18 Limited Liability Company, and DOES I-V,)
ROES VI-X,)

19 Respondents.)
20)
21)

Case No. 2:19-cv-00431-JAD-CWY

STIPULATION AND REQUEST FOR
EXTENSION OF TIME FOR
RESPONDENT TO RESPOND TO
PETITIONER'S PETITION TO
COMPEL ARBITRATION

(First Request)

22 Pursuant to LR 6-1, Petitioner, United Association of Journeymen and Apprentices of the
23 Plumbing & Pipe Fitting Industry of the United States and Canada, Local 525, Las Vegas, Nevada
24 AFL-CIO, and Respondent, Bombard Mechanical, LLC ("Bombard"), by and through their respective
25 counsel of record, stipulate and request that the Court extend the deadline for Bombard to respond
26 to the Petition to Compel Arbitration from the current deadline of April 12, 2019, up to and including
27 May 2, 2019.

28 In support of this Stipulation and Request, the parties state the following:

KAMER ZUCKER ABBOTT *Attorneys at Law*

3000 West Charleston Boulevard, Suite 3 • Las Vegas, NV 89102 • (702) 259-8640

1 1. Bombard was served with the Petition to Compel Arbitration on March 22, 2019,
2 rendering a response due by April 12, 2019.

3 2. Bombard retained Kamer Zucker Abbott to represent it in this matter on March 29,
4 2019.

5 3. Both parties' counsel conferred on April 2, 2019 regarding Bombard's request for an
6 extension of time. Petitioner's counsel was amenable to an extension up to and including May 2, 2019.

7 4. This request is brought in good faith and not sought for the purpose of delay or any
8 other improper purpose. Rather, this request is brought only to provide Bombard's counsel with
9 sufficient time to review and respond to the Petition to Compel Arbitration, taking into account its
10 counsel's previously scheduled labor contract negotiations and briefing deadlines in Norsoph v.
11 Riverside Resort and Casino, Inc., Case 2:13-cv-00580-APG-GWF (D. Nev.), an FLSA collective
12 action case.

13 5. This is the first request to extend the deadline to respond to the Petition to Compel
14 Arbitration. No previous extensions of time have been granted.

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1 WHEREFORE, the parties respectfully request the Court extend the deadline for Bombard
2 to respond to the Petition to Compel Arbitration, from the current deadline of April 12, 2019, up to
3 and including May 2, 2019.

4 DATED this 3rd day of April 2019.

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7
8 Dobberstein Law Group
9 Eric Dobberstein, Esq.
10 Rhonda Long, Esq., Esq.
11 9480 South Eastern Avenue, Suite 244
12 Las Vegas, Nevada 89123

11 Francis J. Morton, Esq.
12 760 North Lamb Boulevard
13 Las Vegas, Nevada 89110

14 Attorneys for Petitioner

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18 Kamer Zucker Abbott
19 Gregory J. Kamer, Esq.
20 Edwin A. Keller, Jr., Esq.
21 Dare Heisterman, Esq.
22 3000 West Charleston Boulevard, Suite 3
23 Las Vegas, Nevada 89102

24 Attorneys for Respondent

25 **ORDER**

26 **IT IS SO ORDERED.**

27 DATED: April 8, 2019

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